

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF IOWA
EASTERN DIVISION

| | | |
|---------------------------|---|--------------------------|
| UNITED STATES OF AMERICA, |) | |
| |) | Case No. 23-CR-1020 |
| Plaintiff, |) | |
| |) | <u>UNRESISTED</u> |
| vs. |) | MOTION TO CONTINUE |
| |) | SENTENCING HEARING AND |
| MATTHEW DAVID KEIRANS, |) | DEADLINES |
| |) | |
| Defendant. |) | |

COMES NOW Defendant, Matthew David Keirans, through counsel, and respectfully moves this Court for an order continuing the sentencing hearing. As grounds in support of this motion, Defendant states as follows:

1. On April 1, 2024, the defendant pled guilty to two counts of a seven-count Indictment (filed December 12, 2023). Count 5 charged False Statement to a National Credit Union Administration Insured Institution, in violation of 18 U.S.C. § 1014; and Count 7 charged Aggravated Identity Theft, in violation of 18 U.S.C. § 1028A(a)(1).

2. A Sentencing hearing is currently set for Friday, November 22, 2024, at 9:00 a.m. (Docket No. 36).

3. The undersigned counsel needs additional time to prepare for the sentencing hearing. Initially, the undersigned incorporates the arguments from his first motion to continue sentencing. Docket No. 35. Next, the undersigned notes that there are approximately 12 contested sentencing issues. Docket No. 37. This case is thus more complex than the average federal sentencing. Indeed, the discovery consists of well over 10,000 pages, to say nothing of the voluminous audio-visual discovery. Penultimately, full and thorough preparation for sentencing requires

investigation of and obtaining documents from other jurisdictions. In short, the undersigned requires additional time to fully defend his client at sentencing.

4. This is the second request for a continuance of the sentencing hearing filed by the defense. The undersigned is requesting a continuance to at least mid-January.

5. Assistant United States Attorney Timothy Vavricek has indicated that the government does not resist this motion.

THEREFORE, Mr. Matthew David Keirans, through counsel, respectfully moves to for a continuance of the sentencing hearing and sentencing deadlines, as requested herein.

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CERTIFICATE OF SERVICE
I hereby certify that on November 6, 2024, I electronically filed this document with the Clerk of Court using the ECF system which will serve it on the appropriate parties.

By: /s/ Melissa Dullea